



# **Seattle Public Schools The Office of Internal Audit**

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**Internal Audit Report  
Testing Integrity**

**January 1, 2014 through - July 31, 2014**

Issue Date: September 16, 2014



## **Executive Summary**

### **Background Information**

Over the past few years, school districts across the nation have been damaged by cheating scandals involving state standardized tests. These incidents of actual and alleged cheating have not only had a negative impact on the reputations of the affected districts, but they also resulted in significant investigation costs. Due to the number of recent scandals and the negative impact they have had on other districts, we are concerned that a cheating scandal would have material implications to Seattle Public Schools if one were to occur here. We planned this audit to determine if Seattle Public Schools has adequate controls in place to prevent cheating on state standardized tests.

The cheating scandals that have occurred around the country have highlighted the importance of standardized tests, and the extreme measures people will take to report positive test scores. The success of teachers, principals, and superintendents is often measured by how well their students perform on standardized tests. There is a strong perception that positive test scores equal quality education, and investigations at other districts have gone as far to note a culture of fear associated with achieving positive test scores.

In addition to the perceptions associated with positive test results, Seattle Public Schools uses student achievement scores as a component of our teacher and principal evaluation systems. Our principals may earn compensation bonuses based in part on student growth on state assessments. We also use state assessments as part of our school segmentation framework. This audit does not advocate for or against standardized testing; however, given the increased importance of test scores in assessing student, educator, and school performance, we believe that the accuracy and integrity of student scores is vital to the District.

Seattle Public School's Research, Evaluation, & Assessment department works collaboratively with school administrators and teachers to provide the tools, guidance, support, and services needed to ensure a smooth testing process for its students. The District has a testing coordinator responsible for overseeing the testing process, and for training the principals and site coordinators at the schools.

For the 2014-2015 school year, the District will be transitioning from paper based testing to the Smarter Balanced online testing system for a majority of state standardized tests. This online testing system is adaptive, where the system will generate a set of questions based on how the student answered the previous question. We cannot audit the Smarter Balanced online system because the District has yet to implement the internal controls associated with that system. However, District management expressed a high degree of value on this audit and requested that we proceed with the audit to assess the current control structure. District management conveyed a strong desire to understand the current control structure so that they can ensure that there is a strong control environment in place to improve student learning. As a result, we designed our audit to assess the adequacy of the overall controls associated with the paper and pencil testing format. Our primary focus was to identify any control weaknesses, and to make recommendations that will ensure that we have strong controls going forward.



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## **Roles and Responsibilities**

This audit was completed as part of the *Annual Risk Assessment and Audit Plan* approved by the Audit and Finance Committee on September 10, 2013. District management has the primary responsibility to establish, implement, and monitor internal controls. Internal Audit's function is to assess and test those controls in order to provide reasonable assurance that the controls are adequate and operating effectively. We conducted the audit using due professional care, and we believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

## **Audit Objectives**

The primary objective of this audit was to determine if the District has implemented adequate controls to prevent cheating on state standardized tests.

## **Scope of the Audit**

January 1, 2014 through July 31, 2014

## **Audit Approach and Methodology**

To achieve the audit objectives, we performed the following procedures:

- Planned the audit in cooperation with the Research, Evaluation, & Assessment department to ensure that we had a strong understanding of the District's testing administration process.
- Analyzed available data to corroborate the information obtained during our walkthroughs.
- Reviewed actual and alleged incidents of cheating at over 20 school districts across the country to obtain an understanding of the controls missing in various cheating schemes.
- Reviewed all applicable RCW's, WAC's, and OSPI reference material for state compliance requirements.
- Interviewed test coordinators at various elementary, middle, and high schools throughout the District to get an understanding of their procedures, and to corroborate information obtained from central administration.
- Interviewed Research, Evaluation, & Assessment staff knowledgeable of the various processes that were covered during the course of the audit.



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## **Conclusion**

Based on the results of our audit procedures, the District has control weaknesses that put it at risk for cheating scandals. The District follows the guidelines released by the Washington State Office of the Superintendent of Public Instruction (OSPI), but there is a greater need to restrict access to test booklets in order to ensure their security and to prevent tampering. Our report includes recommendations that the District should implement in order to adequately prevent and detect cheating.

We extend our appreciation to the Research, Evaluation, & Assessment staff, and to the school staff we visited during the course of the audit, for their assistance and cooperation during the course of the audit.

## **Subsequent Information**

We were not aware of any actual or suspected cheating incidents at Seattle Public Schools when we began this audit, but subsequent to completing the fieldwork portion of our audit the District identified anomalies with the test results of one school. The District referred these anomalies to OSPI and an investigation is being conducted. This school was not part of the sample of schools we visited during our audit, and we are not involved in that investigation. The results of this audit should be analyzed independently of the OSPI investigation.

*Andrew Medina*

Andrew Medina, CPA, CFE  
Director, Office of Internal Audit



## Finding and Recommendations

### 1. Test Booklet Security

The District follows the testing guidelines established by OSPI, and uses a three-step coordination process involving a district coordinator, site coordinators, and proctors. The District Coordinator is a central administration employee who is responsible for the overall testing of the District. The site coordinators are teachers or school administrators who are appointed by the principal to oversee the testing process at their individual school sites. The proctors are responsible for individual classroom testing. The proctors and site coordinators perform their testing administration duties on top of their normal job responsibilities.

The District employs one District Coordinator to monitor and enforce the overall testing protocols of the District. The District Coordinator trains school staff on proper procedures, but the District also places a high degree of reliance on the integrity of the site coordinators and other school staff in order to ensure security of the test booklets. The [OSPI guidelines](#) followed by the District state that, "The period of time that the secure materials are held at a school must be kept to a minimum." The district's test booklets reside at the school sites for the duration of the testing period, which lasts approximately 4-5 weeks. The District Coordinator instructs the site coordinators to secure the test booklets and requires the school principal to certify to their security, but allowing the booklets to remain on site for an extended period of time increases the opportunity for unauthorized access and tampering. Unauthorized access to the test booklets prior to an exam could lead to pre-teaching students the exam content, or it could lead to providing students with actual test answers. Unauthorized access to test booklets subsequent to an exam could result in test answers being changed to improve the test scores. The physical controls over the test booklets must be effective to prevent unauthorized access to test booklets before and after the exams.

#### **Recommendations:**

In order to minimize the risk of tampering, we recommend that the District take steps to minimize the period of time that paper and pencil test booklets reside at the school sites.

In addition, as the District transitions from paper and pencil based testing to online testing, we recommend that it take steps to ensure that the new testing system includes internal controls sufficient to prevent and detect cheating. The following recommendations are intended to serve as a checklist of controls to consider as the District implements the new online testing process. The online testing process has not been designed yet, and the following recommendations should not be construed as a deficiency with the current system. We make the following recommendations in an effort to assist the District as it designs the new online testing process. We recommend that the new online testing process:

- Include a strong tone-at-the top message emphasizing integrity and the value the District places on accurate and reliable test data designed to improve student learning.
- Contain detailed written testing procedures that can be consistently applied among schools and relied upon as a reference document for District employees to follow.



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- Restrict access to unreleased test questions in advance of an exam so that teachers, principals, and other District staff are prevented from pre-teaching students the exam content, as well as providing test answers to students prior to or during an exam.
- Restrict access to completed tests so that teachers, principals, and District staff are prevented from changing test answers after an exam is completed.
- Contain internal controls designed to limit the ability of school staff to coach students during an exam. For example the District could consider prohibiting secondary teachers from proctoring their own students.
- Include controls designed to detect instances of cheating. For example, the District should monitor access to online tests to ensure that the tests have not been accessed outside of the actual test window. The District should also establish acceptable deviation thresholds, and follow up on test results that exceed reasonable variations.
- Include a review of student transfers and expulsions to ensure that they are being made for valid disciplinary reasons, and that students are not being removed from a school's headcount in an attempt to elevate the school's test results.
- Incorporate monitoring of enrollment data and test results to ensure that students are associated with the appropriate school. Consideration should be given to making manual adjustments to school test results to fairly associate a student with the school that was responsible for their education during the majority of the year.

Lastly, although this report focuses primarily on the controls associated with cheating schemes that could potentially be committed by District staff, we also recommend that the District's new online testing system include controls designed to prevent student cheating.



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**Management Response**

*Research, Evaluation & Assessment (REA) concurs with the audit report findings and recommendations. REA is committed to ensuring the integrity of student achievement data collected each year using state assessments. To this end, we will carefully review all our procedures and processes for administering both existing paper-based state assessments (e.g., MSP, EOCs) and new computer based state assessments (e.g., Smarter Balanced). We will develop a corrective action plan for instituting enhanced controls and oversight.*

*A key recommendation of the audit report is to restrict access to test materials. REA does in fact institute procedures that specify explicit restrictions and strict protocols for the handling of test materials by school staff. Principals and school-based staff are trained each year to implement these procedures, and are required to sign documentation attesting that they have followed them.*

*REA believes our school leaders and school staff have demonstrated great integrity and professionalism around testing. However, we agree with the audit recommendation to further restrict access to test materials. It is worth keeping in mind however that REA has only one full time staff member to coordinate multiple state tests administered during the year. We do not currently have funding (for example) to hire seasonal part-time workers during heavy testing periods. As a consequence we rely on training existing school staff to help process materials both before and after testing. Centralization of these efforts would likely require additional resources to implement. For example, the District might choose to centralize the process of presorting test booklets by classroom before sending them to schools. It might also choose to centralize all post-test packaging of materials for shipment to OSPI.*

*Nonetheless REA is committed to considering all solutions including those that will not require excessive new resources, and will seek to study best practice in other districts to help develop a corrective action plan.*

*Sincerely,*

*Eric M. Anderson  
Director, Research, Evaluation & Assessment*